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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM JASPER COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Appellate Case No. 2023-001708

Jasper County, Respondent-Appellant,

v.

Western Surety Company and Denise Smith, Defendants

Of which Western Surety Company is the Appellant-Respondent.

**RESPONDENT-APPELLANT'S MOTION TO FILE INITIAL BRIEF FOR
CROSS-APPEAL OUTSIDE FILING DEADLINES**

Respondent-Appellant Jasper County, by and through the undersigned counsel, hereby moves pursuant to Rule 208, SCACR, for an order of this Court allowing the filing of its Initial Brief for the Cross-Appeal. The ground for this Motion is that counsel read the applicable rule to require the Initial Brief for the Cross-Appeal to be due at the same time that Respondent-Appellant filed its Initial Brief in response to the appeal initiated by Appellant-Respondent. This Motion is not made for purposes of undue delay or any other improper purpose. Therefore, Respondent-Appellant requests the extension.

s/David S. Cobb
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ATTORNEYS FOR RESPONDENT-
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PROOF OF SERVICE

The undersigned, certifies that she served a copy of **Respondent-Appellant Jasper County's Motion to File Initial Brief Outside of Scheduling Deadlines** upon all other counsel of record by emailing a copy to:

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April 17, 2024

s/Heather Hagen
Heather Hagen

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April 17, 2024

by e filing and regular mail:

Jenny Abbott Kitchings

Court of Appeals Clerk of Court

Post Office Box 11629

Columbia, South Carolina 29211

Re: **Jasper County v. Western Surety Company**

Appellate Docket No.: 2023-001708

TP File No.: 10535.105

Dear Ms. Kitchings:

We enclose Jasper County's Motion to Allow Late Filing of its Initial Brief of the Cross-Appeal, with attached proof of service. The filing fee is enclosed by regular mail for the costs associated with this request. If you have any questions or need additional information, please call me at your convenience. With kind regards,

TURNER PADGET

s/David S. Cobb

David S. Cobb

DSC/hah

enclosures

cc: counsel of record (with enclosures)